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VIA ELECTRONIC FILING

June 12, 2025

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Re: *In re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation*
Case No.: 3:16-md-02738-MAS-RLS

Dear Judge Shipp:

In preparation for the upcoming talc status conference scheduled for June 17, 2025, the parties have carefully reviewed and considered the Court's Order of April 15, 2025 (ECF No. 33638). The Order sets forth in detail pending motions to be addressed by Judge Singh, Judge Schneider, and Your Honor in due course.

In addition to the motions outlined in the Court's Order, the parties would like to advise the Court of additional matters:

1. Rule 702 Hearings

- Defendants request hearings on the Rule 702 motions.
- Plaintiffs' position is that Rule 702 hearings are not necessary in light of the fulsome record before the Court.

2. Scheduling of Bellwether Trial

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3. Status of the State Court Consolidated Litigations

- New Jersey MCL, Superior Court of New Jersey, Atlantic County
- JCCP, Superior Court of California, Los Angeles County
- Court of Common Pleas, Philadelphia County, 1st Judicial District of Pennsylvania

4. MDL Case Management

- **Stipulations of Dismissal with Prejudice** – List of cases in which stipulations of dismissals have been filed but the case has not yet been closed. *See Exhibit A.*
- **Notice of Voluntary Dismissal without Prejudice** – List of cases in which Plaintiffs improperly filed a notice of voluntary dismissal without Defendants' consent or leave of Court. *See Exhibit B.*
- **Dismissal of Cases Subject to the April 16, 2025 Orders to Show Cause** – These cases involve Plaintiff Profile Form deficiencies. *See ECF Nos. 37948 and 38119 and the corresponding filings by Plaintiffs.*

Should there be any additional matters not captured in the Court's Order or listed above that require discussion at the hearing, or should you wish to hear argument on any of the motions outlined in the April 15th Order, we request that the Court advise the parties at its earliest convenience, and we will prepare accordingly.

Thank you for your consideration of these matters. We look forward to meeting with you.

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Respectfully submitted,



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cc: Leigh O'Dell, Esq.
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All Counsel of Record (via ECF)